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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

NAKIA V. PORTER, an individual on her
own behalf and on behalf of her minor
children, L.P. and A.P; JOE BERRY
POWELL, JR., an individual; and CLIFTON
POWELL, on behalf of his minor child, O.P.,

Plaintiffs,

v.

COUNTY OF SOLANO; SOLANO
COUNTY SHERIFF'S OFFICE; SHERIFF
THOMAS A. FERRARA, in his official
capacity as Sheriff of Solano County;
DEPUTY DALTON MCCAMPBELL, an
individual; DEPUTY LISA MCDOWELL, an
individual; SERGEANT ROY STOCKTON,
an individual; DEPUTY CONNOR
HAMILTON, an individual; DEPUTY CHRIS
CARTER, an individual; CITY OF DIXON;
DIXON POLICE DEPARTMENT; DIXON
POLICE CHIEF ROBERT THOMPSON, in
his official capacity as Dixon Chief of Police;
OFFICER GABRIEL HOLLINGSHEAD, an
individual, OFFICER AARON WILLIAMS,
an individual, and DOES 1 to 10, inclusive,

Defendants.

Case No. 2:21-CV-01473-KJM-JDP

**PLAINTIFFS' NOTICE OF LODGING
ELECTRONIC EXHIBITS IN SUPPORT OF
MOTION FOR SANCTIONS FOR
SPOILIATION OF EVIDENCE (L.R. 138(l))**

Hon. Kimberly J. Mueller
United States District Judge

Hearing Information:

Date: July 12, 2024
Time: 10:00 a.m.
Judge: Hon. Kimberly J. Mueller
Courtroom: 3, 15th Floor

TO ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE THAT that pursuant to Local Rule 138(l), Plaintiffs Nakia V. Porter, on behalf of herself and her two daughters, L.P. and A.P., Joe Berry Powell, Jr., and Clifton Powell, on behalf of his daughter, O.P. (collectively, “Plaintiffs”), by and through their undersigned counsel of record, hereby lodge the following electronic exhibits with the Court:

1. Exhibit 3 to the Declaration of Yasin Almadani in Support of Motion for Sanctions for Spoliation of Evidence (“Almadani Declaration”), which is a true and correct copy of relevant excerpts from the body camera video footage from the body-worn camera of Solano Sheriff’s Deputy Dalton McCampbell on the night of August 6, 2020, relating to the incident at issue in this lawsuit.

2. Exhibit 4 to the Almadani Declaration, which is a true and correct copy of relevant excerpts of body camera video footage from the body-worn camera of Solano Sheriff’s Sergeant Roy Stockton on the night of August 6, 2020, relating to the incident at issue in this lawsuit.

3. Exhibits 9-1, 9-2, 9-3, 9-4, 9-5, and 9-6 to the Declaration of Yasin Almadani, which are true and correct copies of videos prepared of forensic video and audio expert Jason Fries’ forensic analysis of body camera and dash camera videos produced by Defendants this case.

4. Exhibit 12 to the Declaration of Yasin Almadani, which is a true and correct copy of the Rule 26 Expert Report of Professor Peter Simi, Ph.D., Plaintiffs’ expert on extremism and white supremacist movements.

The aforementioned exhibits will be delivered to the Court via a USB flash drive.

Dated: May 16, 2024

ALMADANI LAW

/s/ Yasin M. Almadani

Yasin M. Almadani, Esq.

AI LAW, PLC

/s/ Ahmed Ibrahim

Ahmed Ibrahim, Esq.

Attorneys for Plaintiffs